4203

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

MEMORANDUM

Date: 11.27.02

TO: CERCLIS Files

SUBJECT: CERCLIS Update/Completed Site Assessment Document

The following completed document is attached:

APA: _____ PA: ____ SI: ____ PA/SI: ___ ESI: ____ Other: Site Reassessment

Site Name: Western Drums Inc.
EPA ID: CAD983643651
City, County, State: Hayward, Alameda Cty, CA

Latitude: _____ Longitude: _____

CERCLIS Data Changes: ——
(Changes to CERCLIS already complete - Management Concurrence only)

EPA Decision: Already archived
Archive Site: ✓ Yes _____ No
(Requires Archive Memo signed by both SAM and ERO representative)

Lead Agency: DTSC

Approval by Site Assessment Manager: Anderson

Sign-Off Date: 11.27.02

Document Screening Coordinator: Hammons 1/9/03

Chief, States, Planning, and Assessment Officer (SFD-9-1): B. Cannon

Revised 10/3/01

REMEDIAL SITE ASSESSMENT DECISION - EPA REGION IX

EPA ID: CAD983643651 **Site Name:** WESTERN DRUMS INC. **State ID:** 4203

Alias Site Names:

City: HAYWARD **County or Parish:** ALAMEDA **State:** CA

Refer to Report Dated: 02/11/2002 **Report Type:** SITE REASSESSMENT 001

Report Developed by: STATE

DECISION:

- [X] **1. Further Remedial Site Assessment under CERCLA (Superfund) is not required because:**
  - [X] **1a. Site does not qualify for further remedial site assessment under CERCLA (No Further Remedial Action Planned - NFRAP)**
  - [ ] **1b. Site may qualify for action, but is deferred to:**
- [ ] **2. Further Assessment Needed Under CERCLA:**
  - **2a. Priority:** [ ] **Higher** [ ] **Lower**
  - **2b. Other: (recommended action)** NFRAP (No Futher Remedial Action Planned

DISCUSSION/RATIONALE:

Site has one sample documenting PCE release to groundwater. However, there is only one well within 4 miles of the site, there are no surface water, soil, or air targets.

Site Decision Made by: J. JOHNSON

Signature: _____ **Date:** 11/27/2002

EPA Form # 9100-3

4203

SITE REASSESMENT 11/27/02

EPA REGION IX SITE SCREENING/PRIORITIZATION CHECKLIST

This review checklist is to be used by individual site screening staff when reviewing sites which have been brought to the attention of EPA or the State. Each site is reviewed on the merits of the discovery documentation and additional information gathered during the screening process. The guiding principal in evaluating a given site is to use common sense in assessing the information and subsequently presenting the site and its known hazardous potential to the SST. All sections of this form are to be completed for both screens and prioritizations.

1.0 GENERAL INSTRUCTIONS

Complete Section 1 for the site using readily available information and contacting appropriate individuals. A contact log (Attachment A) should be used to document information gained through correspondence, interviews, and telephone calls. Handwriting is acceptable if it is legible. Attach extra pages if necessary.

1.1 Site Information

Site Name: Western Drums, Incorporated

Alias Name: Container Management Services

Site Street Address: 21301 Cloud Way

City, County, State: Hayward, Alameda, California

EPA ID Number: CAD983643651/ CAR000031526

Site Screener: Annina O. Antonio Date: 02/11/2002

Date of Discovery: July 1992

Discovery Vehicle:

[ ] County Referral	[ ] State Referral	[ ] Lawsuit
[ ] Citizen Petition	[✓] State PA/SI Grant	[ ] Removal
[ ] RCRA Referral	[ ] Nonemergency Release	[ ] Newspaper
[ ] Site Discovery Project	Report	[ ] Other

Is this site part of an NPL site? [ ] Yes [✓] No

CERCLIS Status:	[ ] Discovery	[ ] PA
[✓] NFA	[ ] SI	[ ] ESI
[ ] Not in CERCLIS	[ ] Other/Specify: _____	[ ] Site Discovery Project Area: _____

State oversight role:
PA/SI Cooperative Agreement [✓] Yes [ ] No [ ] Not applicable
Cooperative Agreement Number: V999252 -03-1

EPA Project Officer: Jere Johnson

RCRA Status:	[✓] Generator	[ ] Transporter
	[ ] TSDF	[ ] Not listed in RCRIS

In a State Database(s)? [✓] Yes [ ] No If yes, specify. CalSites, HazNet

CURRENT ACTIVITY: **[✓] Site Screening** **[ ] Site Prioritization**

1.2 CERCLA Eligibility

If the answer to question 1 is "No", or if the answer to any question of 2 through 8 is "Yes", the site is ineligible for CERCLA evaluation and the decision at the bottom of this page is "No Further Action Under CERCLA". A "yes" answers to questions 9 through 16 identifies sites that may not be appropriate for CERCLA evaluation without further justification. If a question cannot be answered, explain why in the Comments section below.

1.	Has a release of hazardous substances, pollutants, or contaminants occurred?	[✓] Yes	[ ] No
2.	Does the release or threat of release consist only of crude oil or unaltered petroleum product?	[ ] Yes	[✓] No
3.	Is the site subject to corrective action under RCRA Subtitle C (hazardous waste treatment, storage, or disposal facility)?	[ ] Yes	[✓] No
4.	Does the release or threatened release fall under the jurisdiction of the Uranium Mill Tailings Radiation Control Act (UMTRCA)?	[ ] Yes	[✓] No
5.	Does the release or threatened release fall under the jurisdiction of the Atomic Energy Act (AEA)?	[ ] Yes	[✓] No
6.	Is the release or threatened release a result of a legal application of pesticides under Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA)?	[ ] Yes	[✓] No
7.	Is the release or threatened release regulated under the Oil Pollution Act (OPA)?	[ ] Yes	[✓] No
8.	Is the release or threatened release permitted under the Nuclear Regulatory Commission (NRC)?	[ ] Yes	[✓] No
9.	Is the site a federal facility?	[ ] Yes	[✓] No
10.	Is the site outside of U.S. boundaries?	[ ] Yes	[✓] No
11.	Is the site outside of EPA, Region IX borders?	[ ] Yes	[✓] No
12.	Is the site within Native American Tribal lands?	[ ] Yes	[✓] No
13.	Is the site currently under the control and management of a state/local agency? If yes, which agencies?	[✓] Yes	[ ] No
14.	Is the site currently operating?	[✓] Yes	[ ] No
15.	Is the site address valid?	[✓] Yes	[ ] No
16.	Has the site been investigated under an alias?	[✓] Yes	[ ] No

Comments: (1) Tetrachloroethylene was detected at a concentration of 19 ppb from a groundwater sample collected in June 1995. (13) The Hayward Fire Department has Western Drum Inc.'s Hazardous Management Business Plan (HMBP) on file. The HMBP lists the following chemicals WDI uses at their facility: Sulfuric acid, hydrochloric acid, sodium hydroxide, sodium nitrate, oil, acetone, etc. The HFD's latest inspection of the WDI facility was on 7/22/99. The inspection included a Hazardous Waste Generator inspection, a Hazardous Materials Storage Permit inspection, HMBP inspection, and an inspection of WDI's aboveground tank. The HFD inspection also included WDI's 2 conditionally authorized units covered under their Permit By Rule (PBR) non-RCRA permit. The HFD inspection report indicates WDI is in compliance with all the programs inspected. WDI's waste streams include: waste oils/used oils, oily sludge, and paint wastes. The inspection report indicated WDI's correct US EPA ID Number as CAR000031526. (16) WDI is also known as Container Management Services.

DECISION: **[ ] No Further Action Under CERCLA**

[✓] Go to Section 2

2.0 TECHNICAL INFORMATION

This section contains information about site's operational history and environmental sampling. Complete the following section by filling in the blanks or checking the appropriate boxes. If a question cannot be answered, explain why. If a drive-by is performed, complete Attachment B.

2.1 Operational History

1a. List present site owner(s) and operator(s). [Include dates of ownership]:
Hector & Ana Villalba -Owner - 12/85 to present
724 Fathom Drive
San Mateo, CA 94404
Western Drums, Inc - Operator - 1983 to present

1b. Are hazardous substances presently on site? [✓] Yes [ ] No
If yes, how and where are substances stored and used?
Hazardous wastes generated from the manufacturing and reconditioning processes are stored in drums and disposed under manifest offsite. WDI wastes consist of burner ash from the thermal line, caustic and paint sludge from the rinse line, and shot blast dust from the final coating process. Oil and solvent residues found in drums are collected and shipped back to the original owner.

2a. List historic site owner(s) and operator(s). [Include dates of ownership]:
Hayward Airport Outfield - Operator - 1947-1952
Western Sky Industries - Operator - 1952-1969
Mack Western Trucks - Operator/Owner - 1969-1983

2b. Were hazardous substances present on site in the past? [ ] Yes [ ] No
If yes, how and where were substances stored and used? Describe past operations briefly.
There is no available information regarding the use or storage of hazardous substances in the past.

Additional comments:

2.2 Contaminant(s):

List any hazardous substances, pollutants, or contaminants that have been identified at the site and indicate whether they have been quantified (e.g., by sampling).

		Suspected	Identified	Quantified	Comments
[ ]	Ammonia	[ ]	[ ]	[ ]	
[ ]	Arsenic	[ ]	[ ]	[ ]	
[ ]	Asbestos	[ ]	[ ]	[ ]	
[ ]	Beryllium	[ ]	[ ]	[ ]	
[ ]	Cadmium	[ ]	[ ]	[ ]	
[ ]	Carbon tetrachloride	[ ]	[ ]	[ ]	
[ ]	Chloroform	[ ]	[ ]	[ ]	
[ ]	Chromium (+3 or +6)	[ ]	[ ]	[ ]	
[ ]	Copper	[ ]	[ ]	[ ]	
[ ]	Cyanide	[ ]	[ ]	[ ]	
[ ]	Dichloroethene,1,1-	[ ]	[ ]	[ ]	
[ ]	Dioxin	[ ]	[ ]	[ ]	
[ ]	Ethyl benzene	[ ]	[ ]	[ ]	
[ ]	Lead	[ ]	[ ]	[ ]	
[ ]	Mercury	[ ]	[ ]	[ ]	
[ ]	Methylene chloride	[ ]	[ ]	[ ]	
[ ]	Nickel	[ ]	[ ]	[ ]	
[ ]	P-Dichlorobenzene	[ ]	[ ]	[ ]	
[ ]	Pentachlorophenol	[ ]	[ ]	[ ]	
[ ]	Phenol	[ ]	[ ]	[ ]	
[ ]	Polychlorinated biphenyls (PCBs)	[ ]	[ ]	[ ]	
[ ]	Polyaromatic hydrocarbons (PAHs)	[ ]	[ ]	[ ]	
[✓]	Tetrachloroethylene	[ ]	[ ]	[✓]	
[ ]	Toluene	[ ]	[ ]	[ ]	
[ ]	Trichloroethylene	[ ]	[ ]	[ ]	
[ ]	Vinyl chloride	[ ]	[ ]	[ ]	
[ ]	Xylene	[ ]	[ ]	[ ]	
[ ]	Zinc	[ ]	[ ]	[ ]	
[ ]	Other chemicals (List):				
		[ ]	[ ]	[ ]	

Additional Comments: A very limited soil and groundwater sampling was conducted in June 1995 by Western Drum. Soil and grab groundwater samples were collected from each of 3 sample locations and analyzed for volatile organic compounds (VOCs). 3 samples each of soil and groundwater were analyzed for VOCs. Tetrachloroethylene was detected at a concentration of 19 ppb from one of the groundwater samples collected. The other 2 groundwater samples and all of the 3 soil samples showed non detect (ND) levels of the VOCs tested. Metals and other contaminants were not included in the sample analyses. High detection limits were used by the laboratory in the sample analyses.

2.3 Has a release as defined in CERCLA Section 101(22) occurred?

[✓] Yes [ ] Suspected [ ] No

Identify the source(s) of the release or suspected release (e.g., drums, landfill, surface impoundment, waste pile, etc.):Source of release is unknown.

2.4 Pathway(s) of contaminant migration:

[ ] Air [✓] Groundwater [ ] Surface Water [ ] Soil

Briefly describe any identified pathway: Tetrachloroethylene was detected in groundwater at the site during a sampling event conducted by WDI.

2.5 Sampling History

1. Has sampling been conducted? [✓] Yes [ ] No

2. If environmental sampling has been conducted, use the Sampling Event Summary Table, Attachment C, to record the information.

2.6 Additional Information

Use this space to present additional information that may be used to support site screening decisions.

Western Drum, Inc. (WDI) is a drum manufacturing and reconditioning facility. It utilizes three plants: the New Drum Manufacturing Plant (NDMP), the Rinse Recondition Plant (RRP), and the Thermal Recondition Plant (TRP). The NDMP assembles drums by rolling sheets of steel into drum form and applying a paint coating. During the process, phosphate rinses are used to clean the steel. The waste phosphate rinsewater is pH adjusted and discharged into the sewage system. WDI operates under a Permit By Rule (PBR- Non RCRA Permit). They have 2 conditionally authorized units: an oil/water separator and an ultra filtration system. Drums accepted for reconditioning are randomly sampled and screened chemically to determine if the residue contents agree with past drum contents reported on profiles and shipping documents. Once the residue contents are established, containers enter the appropriate treatment line: either "wash" via the RRP or "burn" via the TRP. Drums containing extremely hazardous materials or acute hazardous wastes are only accepted after they have been triple rinsed with an appropriate solvent able to remove any residues. All drums are first separated according to content type. Drums taken to the RRP are emptied. Usable products are placed in drums and returned to the owner for reuse or recycling. Wastes are collected in storage tanks for off site disposal. Drums are triple rinsed with high pressure water, low concentration sodium hydroxide and sodium nitrite. All drums are then visually inspected for cleanliness using tube lights while some drums are selected randomly for wipe-test analysis to ensure decontamination. Drums which pass light inspection are then buffed, chimed, water tested, brushed, pre-heated, painted and allowed to air dry before being fitted with bungs. Drums taken to the TRP are screened similar to those sent to the RRP. The drums and lids then enter a dry heat burner on a steel conveyor. The drum burner (temperature range 1,600 to 1,800 °F)incinerates any remaining residues inside the drums and also burns the interior and exterior drum paint. The steel drums

heat up to 1,000°F. After the drums pass through the burner, the conveyor reverses direction and scrapes any ash. After decontamination in either the RRP or TRP, steel drums are shot blasted prior to coating. This activity is connected to baghouses for particulate collection.

3.0 REMOVAL ASSESSMENT CRITERIA — NCP EVALUATION

Use the following criteria to determine if the site should be referred to EPA's Removal Section. If the answer to any question is yes, get EPA concurrence for the decision. If all answers are no, go to Section 4. If a question cannot be answered, explain why in the Comments section below.

1.	Is there actual or potential exposure to nearby populations, animals, or the food chain from hazardous substances, pollutants, or contaminants?	[ ] Yes	[✓] No
2.	Is there actual or potential contamination of drinking supplies or sensitive ecosystems?	[ ] Yes	[✓] No
3.	Are hazardous substances, pollutants, or contaminants in drums, barrels, tanks, or other bulk storage containers which may pose a threat of release?	[✓] Yes	[ ] No
4.	Are there high levels of hazardous substances, pollutants, or contaminants is soils largely at or near the surface, which may migrate and affect populations or the environment?	[ ] Yes	[✓] No
5.	Could weather conditions cause hazardous substances, pollutants, or contaminants to migrate or be released?	[ ] Yes	[✓] No
6.	Is there a threat of fire or explosion?	[ ] Yes	[✓] No
7.	Are there appropriate Federal or State response mechanisms to respond to the release or potential release?	[✓] Yes	[ ] No
8.	Are there other situations or factors which may pose threats to public health, welfare, or the environment?	[ ] Yes	[✓] No
9.	For the situation where there appears to be primarily a groundwater contamination problem, is there a near-surface source which can be removed?	[ ] Yes	[✓] No

Comments: (3) WDI manufactures and reconditions metal and plastic drums. It only accepts empty containers for reconditioning. However, some residual materials may still be present in the containers. (7) The Hayward Fire Department and the California Office of Emergency Services (OES) have the ability to respond to hazardous releases or potential releases. (9) The entire site is covered with 3 inches of asphalt on top of 6 inches of concrete.

DECISION:

[ ] Removal Assessment

[ ] Expanded Removal Assessment

[✓] Not Appropriate For Removal Action

4.0 OTHER INFLUENCING FACTORS

Assign a high, medium, or low priority category to each of the following factors and then use these factors to help make preliminary recommendations in Section 5. A high priority influence may indicate that a Preliminary Assessment should be conducted as a high priority without regard to other screening factors.

Other Influences	High	Medium	Low
1. Site remedial/ removal history	[✓] None	[ ] Some	[ ] All wastes removed
2. Regulatory involvement	[ ] No involvement	[ ] Somewhat involved	[✓] Other agency currently active
3. Environmental justice	[ ] Site is in low income/minority neighborhood		[✓] Site is not in low income or minority neighborhood
4. Brownfields/ Redevelopment	[ ] Possible candidate		[✓] Not a likely candidate
5. Political attention	[ ] Very visible/vocal	[ ] Some involvement	[✓] None
6. Public attention	[ ] Very visible/vocal	[ ] Some involvement	[✓] None
7. Remedial Costs	[ ] Likely very expensive or difficult		[✓] Easy and relatively cheap

Comments:
(1) The US EPA conducted a PA in 2/93 and re-evaluated WDI in 11/94. The PA concluded that there was a potential for release of hazardous substances via the groundwater and surface water routes but the threat they posed were both minimal. The site is fully covered by asphalt and concrete, and no surface water intakes were present. No further action was recommended by the US EPA in 11/94. (2) The City of Hayward Fire Department (HFD) conducted an inspection of WDI in 7/99 and found their Hazardous Materials Programs under CUPA to be in compliance. WDI's Hazardous Management Business Plan (HMBP) is on file at the HFD.

OTHER INFLUENCING FACTORS CATEGORY:

HIGH MEDIUM **LOW**

5.0 SITE PRIORITIZATION WORKSHEET

Site Name: Western Drums **Site Screener:** Annina O. Antonio
EPA ID Number: CAD983643651 **Date:** 02/11/2002
Site Screen: ✓ **Site Prioritization:** _____

The following risk-based criteria should be used as a guideline to assist in the prioritization of pre-CERCLIS and CERCLIS sites. These guidelines can be used in various stages of assessment. When interpreting the information provided below, one should understand that conservative assumptions were made where information is lacking and the risk value is subjective.

Site screeners should complete this form by using the categories as guidelines. The "Notes" sections should be used to document assumptions made, data sources, or other information pertinent to determining risk prioritization. For benchmarks, use industrial/residential PRGs for soil, MCLs for groundwater, and NOAA standards for sediments.

5.1 HAZARDS IDENTIFICATION

Complete the sections below for the suspected contaminants of greatest concern. Use SCDMs as a reference for assigning hazardous substance risk category. Assign a Hazard Factor for each hazardous substance evaluated and then assign an Overall Hazard Factor Value combining the separate Hazard Factors. If only one hazardous substance is evaluated, the Overall Hazard Factor Value will be the same as the Hazard Factor for A. Create sections for "Hazardous Substance C" and "D" if necessary.

HAZARDOUS SUBSTANCE A: Tetrachloroethylene

Estimate the risk associated with the hazard properties for this hazardous substance.

Hazard Property	HIGH	MEDIUM	LOW
Quantity	[ ] ≥10,000 lbs; or or 5 mil. gals; or or 25,000 yds^3	[ ] <10,000 lbs and ≥100 lbs; or <5 mil. gals and ≥50,000 gals; or <25,000 yds^3 and ≥250 yds^3	[✓] <100 lbs. or 50,000 gals. or 250 yds^3
Toxicity	[ ] ≥10,000	[✓] <10,000 and ≥100	[ ] <100
Mobility	[ ] 1	[✓] <1 and ≥0.001	[ ] <0.001
Bioavailabilty	[ ] ≥1,000	[✓] <1,000 and ≥10	[ ] <10
Concentration (if known)	[✓] ≥benchmark = 5ppb (MCL) sample = 19 ppb	[ ] near benchmark = sample = _____	[ ] low relative to benchmark = _____ sample = _____
Level of Containment	[✓] None	[ ] Partial (explain below)	[ ] Full (explain below)
Hazard Factor for A	HIGH	**MEDIUM**	LOW

HAZARDOUS SUBSTANCE B: _____

Estimate the risk associated with the hazard properties for this hazardous substance.

Hazard Property	HIGH	MEDIUM	LOW
Quantity	[ ] ≥10,000 lbs; or or 5 mil. gals; or or 25,000 yds^3	[ ] <10,000 lbs and ≥100 lbs; or <5 mil. gals and ≥50,000 gals; or <25,000 yds^3 and ≥250 yds^3	[ ] <100 lbs. or 50,000 gals. or 250 yds^3
Toxicity	[ ] ≥10,000	[ ] <10,000 and ≥100	[ ] <100
Mobility	[ ] 1	[ ] <1 and ≥0.001	[ ] <0.001
Bioavailabilty	[ ] ≥1,000	[ ] <1,000 and ≥10	[ ] <10
Concentration (if known)	[ ] ≥benchmark = sample = _____	[ ] near benchmark = sample = _____	[ ] low relative to benchmark = _____sample = _____
Level of Containment	[ ] None	[ ] Partial (explain below)	[ ] Full (explain below)
Hazard Factor for B	**HIGH**	**MEDIUM**	**LOW**

Comments: _____

OVERALL HAZARD FACTOR VALUE: HIGH **MEDIUM** LOW

5.2 VULNERABILITY ANALYSIS

Assign a risk category to each of the following vulnerability factors. Assign an Overall Vulnerability Factor Value for the site based on the dominant vulnerability risk categories.

Vulnerability Factor	High	Medium	Low
1. Environmental Setting - Land use within 0.5 miles of the site	[ ] Residential	[ ] Agricultural/ Commercial	[✓] Industrial
2. Sensitive Populations - Children, the elderly, or groups with poor health live:	[ ] Within 0.25 miles of site		[✓] More than 0.25 miles from site
3. Population Density - Evaluate within 0.5 miles.	[ ] Dense	[✓] Moderate	[ ] Sparse
4. Groundwater Use - Wells used for drinking water are located:	[ ] Within 0.5 miles of the site	[ ] 0.5 to 2 miles from site	[✓] More than 2 miles from site
5. Groundwater Contamination - Evaluate groundwater contamination within 2 miles of the site.	[ ] Known	[✓] Possible	[ ] Not likely
6. Surface Water Location - Distance to nearest surface water body. If used for drinking water or known to be contaminated, bump to next higher risk category.	[ ] Within 0.5 miles of the site	[✓] 0.5 to 2 miles from site	[ ] More than 2 miles from site
7. Sensitive Habitats - Distance to nearest sensitive habitat. If known or projected contamination within habitat, bump to next higher risk category.	[ ] Within 0.5 miles of the site	[ ] 0.5 to 2 miles from site	[✓] More than 2 miles from site
8. Soil/Air Contamination - Evaluate the potential for exposure to individuals from contaminated soil or air releases.	[ ] Documented or probable exposure	[ ] Potential for exposure	[✓] Exposure not likely
9. Sampling Data Confidence - Evaluate the quality of any data available for the site.	[ ] No oversight; no QA/QC; no data	[✓] Regulatory oversight; EPA methods; partial or unknown QA/QC	[ ] Regulatory oversight; EPA methods; QA/QC validation

Notes: (9) Sampling event conducted with no actual regulatory oversight. Sampling used EPA methods with QA/QC but used high detection limits. The soil and groundwater samples were only analyzed for VOCs. Metals and other contaminants associated with the company's operations were not included in the analyses.

OVERALL VULNERABILITY FACTOR VALUE: HIGH MEDIUM **LOW**

5.3 PRIORITIZATION SCREENING RISK ANALYSIS

Assign a Site Priority Level based on the dominant risk categories given for the hazard and vulnerability factor values.

OTHER INFLUENCING FACTORS	HIGH	MEDIUM	**LOW**
HAZARD FACTOR VALUE	HIGH	**MEDIUM**	LOW
VULNERABILITY FACTOR VALUE	HIGH	MEDIUM	**LOW**

Additional Comments: _____

OVERALL SITE PRIORITY LEVEL: HIGH MEDIUM **LOW**

6.0 SITE RECOMMENDATION

Site Name: Western Drums
EPA ID Number: CAD983643651

Site Screener: Annina O. Antonio
Date: 02/11/2002

6.1. Further Site Assessment Warranted

6.1.a Under DTSC Lead

Recommend further site investigation under DTSC lead.

6.1.b Under EPA Cooperative Agreement

High Priority [ ] **Medium Priority** [ ] **Low Priority** [ ]

Recommend further site investigation under the EPA cooperative agreement.

6.2. Recommended for Removal Assessment or Expanded Removal Assessment [ ] [ ]

Recommend referral to EPA's Removal Section.

6.3. Referral To DTSC'S Hazardous Waste Management Program (REFRC) [ ]

Recommend REFRC for sites that can be remediated as a Corrective Action under H&S Code 25187.

6.4 Referral to Regional Water Quality Control Board (REFRW) [ ]

Recommend REFRW for sites that fall under RWQCB authority and for which RWQCB is providing oversight of investigation/remediation.

6.5 Referral to another agency (REFOA) [ ]

Recommend REFOA for sites where another agency (other than RWQCB) including DTSC is providing or has provided oversight. Name agency below.

6.6 No Action Under CERCLA

Recommend No Action for sites where documented contamination is not significant by EPA/DTSC standards and the presence of greater contamination is unlikely.

Comments: Tetrachloroethylene was detected in 1 groundwater sample in 6/95 at 19 ppb (MCL is 5 ppb). Only VOCs were analyzed. No other contaminants were sampled. There are no facilities adjacent to the site which might have caused contaminant migration. WDI's hazardous materials activities are under the direct oversight of the Hayward Fire Department (as CUPA). However, no drinking water use of significance, no surface water pathway of significance, no air or soil targets.

EPA CONCURRENCE: _____ 11.27.02
signature date

Attachment A

SITE SCREENING CONTACT LOG

Site Name: Western Drums Inc. (WDI) **Site Screener:** Annina O. Antonio

Contact Name	Affiliation	Telephone Number	Date	Discussion
1. Self	Dept of Toxic Substances Control	(510)540-3844	11/1/01	NCCCOB Files for WDI were reviewed. Site screening completed in 5/93 by DTSC recommended a Preliminary Endangerment Assessment (PEA). A Preliminary Assessment (PA) was completed by the US EPA FIT in 2/93 recommended Site Evaluation Accomplished (SEA).
2. Melinda Wong	SF Regional Water Quality Control Board	(510) 622-2430	11/15/01	No files for WDI at SFRWQCB
3. Self	Dept of Toxic Substances Control	(510)540-3844	11/26/01	Reviewed US EPA files for WDI. The file had the same PA report as DTSC copy completed in 2/93. SEA recommendation clarified in a letter to WDI from US EPA dated 11/7/94. SEA recommendation in 1993 was the official designation for sites not ranking enough to be included in the National Priority List (NPL). The letter officially designated a No Further Action (NFA) status to WDI.
4. Miles Perez	Hayward Fire Department (HFD) Haz Mat Office	(510) 583-4910	11/26/01	HFD oversees WDI's Hazardous Materials Activities as a Certified Unified Program Agency (CUPA). Their Hazardous Materials Business Plan, Hazardous Waste Generator Permit, and Tiered Permit are all current.

Annina Antonio
<AAntonio@dtsc.ca.gov>

05/08/02 05:13 PM

To: Jere Johnson/R9/USEPA/US@EPA
cc: Denise Tsuji <DTsuji@dtsc.ca.gov>
Subject: Western Drum Re-Assessment

Hi, Jere!

I contacted James Yoo of the Alameda County Public Works Agency to get the drinking water well info (domestic use) you requested. According to him, there is only one well located within the 4-mile radius of the Western Drum Site (21301 Cloud Way, Hayward) and it serves approximately 100. I hope this helps.

Thank you.

Nina Antonio

ATTACHMENT B

SITE SCREENING OBSERVATION RECORD

Site Name: Western Drums, Incorporated **Site Screener:** Annina O. Antonio
EPA ID Number: CAD983646651 **Date:** 12/13/2001

1. **Status:** Active ✓ Different Company
   Inactive

2. **Setting:** Residential Commercial
   Industrial ✓ Agricultural
   Paved (Fully) ✓ Unpaved
   Restricted access ✓ Unrestricted access
   Near RR tracks Near drainage

   Vegetation
   Topography Flat
3. **Visibility:** Clear

4. **Waste Description/ Containment:** Pit Ditch
   Tanks Buckets
   Dumpster Sacks
   Scattered Other
   Pond Trash Can
   Drums ✓ Piles

   Stored On: Asphalt Pallets
   Concrete Other
   BareGround Gravel

   Waste Type: Garbage Liquid
   Sludge Gas
   Inert Solid

   Describe quantities, labeling, colors, odors, etc.: Hundreds (maybe even thousands) of drums were observed from the outside.

5. **Distance to surface water and sensitive environments or ecosystems:**
   The San Francisco Bay is approximately 1- 3/4 mile away from the site

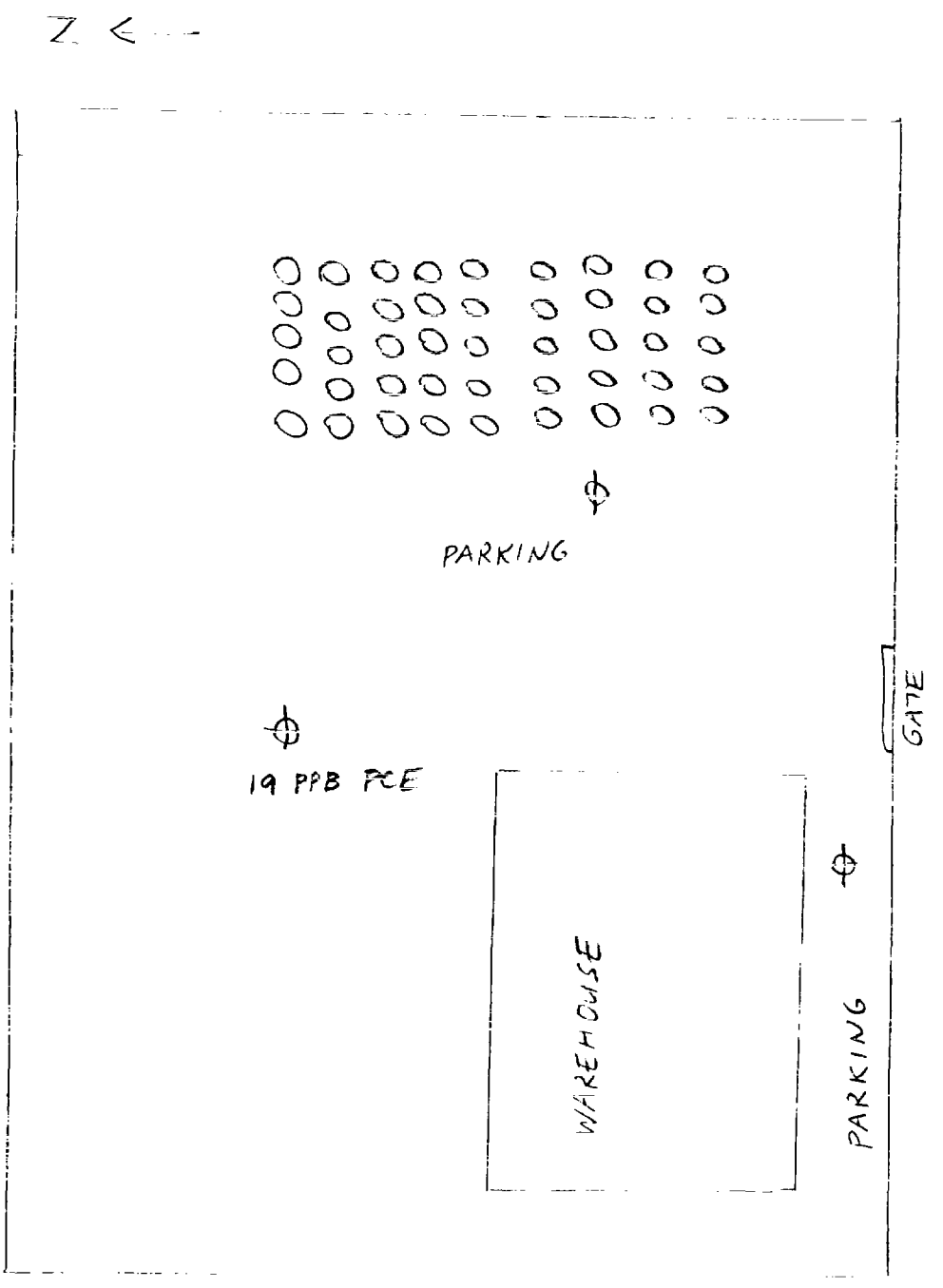
6. **Proximity to residences, schools, daycare facilities, hospitals, nursing homes, etc.:**
   The nearest residence is approximately less than 1 mile away. The nearest school is approximately 1 mile away. No day care centers or nursing homes were observed nearby.

7. **Estimated number of people living or working in the area:** Approximately 100 people estimated to be working at the facility.

8. **Distance to food processing/packaging or agricultural production:** No food processing or food packaging or agricultural production facilities were observed near the facility.

9. **Additional Information:**

10. Sketch or attach a diagram of the facility with relevant features and labels.



WESTERN DRUMS, INC.
21301 CLOUD WAY
HAYWARD, CALIFORNIA

OO - DRUMS (STACKS)
⊕ - GW SAMPLE LOCATIONS

Attachment C

SITE SCREENING SAMPLING EVENT SUMMARY TABLE

Site Name: Western Drum **Site Screener:** Annina O. Antonio

Date	Event	Media	Location	Depth	Method	Quality	Result	Benchmark
06/13/95	Western Drum	Groundwater	B-2	4 feet	US EPA 8240	Medium	Tetrachloroethylene = 19 ppb	MCL = 5 ppb

Key:

Date - Date sample was collected.
Event - Who did it and why?
Media - e.g., groundwater, soil, air, etc.
Sample Location - Physical location with respect to source (e.g., up-or downgradient).

Sample Depth - For soil, depth below ground surface sample was collected. For groundwater, depth of well screen.
Method - Analytical testing method used.

Data Quality - QA/QC level (high, medium, or low)
Result - Analytical results (parameter/value, units)
Benchmark - Risk-based benchmark for parameters in the same units as results. Identify which benchmark used (for soil use PRGs (industrial/residential) for water use MCLs). Sediments NOAA standards.